

Nomination Received by Council on Environmental Quality, Executive Office of the President  
For the CEQ NEPA Pilot Project Program  
<http://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/nepa-pilot-project-nominations>

**PART I. NOMINATOR**

<b>First Name:</b>	David
<b>Last Name:</b>	Reese
<b>Organization:</b>	DHS, Office of Safety and Environmental Programs
<b>Project Title:</b>	[None Submitted]
<b>Submitted by:</b>	Federal Agency
<b>Date Received:</b>	06/15/2011

**PART II. SHORT ANSWERS**

**I. What Federal agency or agencies will be involved in this pilot project?**

The U.S. Department of Homeland Security, Federal Emergency Management Agency is leading this project. Multiple federal agencies have contributed input to this project. This project should be expanded to encompass additional federal agencies to make benchmarking and comparative information sharing among agencies possible.

**II. What is the Federal action to which this NEPA pilot project applies?**

This project is systematically evaluating and improving the performance of FEMA’s NEPA program. This performance improvement project has determined that 35 management attributes are essential for the optimal performance of world-class NEPA organizations. Using these 35 management attributes, this project is helping to surface NEPA best practices, prioritize resource allocations, and optimize staffing structures to improve the performance of FEMA’s NEPA program.

Rather than focusing on a discrete area of NEPA performance, this pilot project is providing qualitative and quantitative data necessary to improve FEMA’s entire NEPA program. While this project has been customized for FEMA, it could easily be deployed with other federal agencies. This would help improve NEPA performance within those agencies and would permit benchmarking and comparative assessments between agencies.

Within FEMA, this project will help improve the application of NEPA to multiple Federal actions. FEMA has a significant environmental planning and historic preservation program that analyzes and helps mitigate the potential environmental effects of FEMA’s disaster preparedness and response programs including FEMA’s grant-making functions. This project will help integrate environmental considerations into these decision-making processes producing better decisions based on sound environmental analyses.

**III. How will this pilot project reduce the costs and time needed to complete the NEPA process?**

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This project is improving the effectiveness and efficiency of FEMA's NEPA program. This is reducing the costs and time needed to complete the NEPA process in many ways:

- By helping to integrate NEPA into FEMA's core decision-making process, this project is improving the efficiency of FEMA's NEPA process and helping FEMA to make better decisions.
- Further, improving integration of NEPA into grant processes, this pilot is shortening the time required for FEMA approval of disaster grants.
- By helping to align the NEPA process with FEMA's mission, this project is reducing organizational resistance to NEPA. That will, in turn, make the NEPA process more efficient within FEMA.
- The staffing and resource assessment phase of this project is helping to prioritize resource allocations and optimize staffing structures to further improve the performance of FEMA's NEPA program.

**IV. How will this pilot project ensure rigorous environmental protection?**

By promoting integration of NEPA into the decision-making process, this project is helping to make sure that decisions made by FEMA take into account the full range of potential environmental effects and the full range of alternatives available to minimize or mitigate those effects. By helping FEMA staff recognize that NEPA is integral to and supports FEMA's mission, this project will increase the use of NEPA as a decision-making tool. Finally, by facilitating rigorous environmental analyses as required by NEPA, this project will ensure rigorous environmental protection.

**V. How will this pilot project improve the quality and transparency of agency decisionmaking?**

The whole structure of this performance improvement project is designed to improve the quality and transparency of agency decision-making. A central thrust of this project is to identify best practices that can improve the integration of NEPA into FEMA decision-making and that support "Decision-Making Visibility." Best practices being evaluated in Phase IV of this project include pre-positioning of environmental analyses for disasters through an increased use of programmatic analyses. Other examples include increasing training of FEMA customers to better integrate NEPA early in the grant-making process.

**VI. Will this pilot project develop best practices that can be replicated by other agencies or applied to other Federal actions or programs? Please describe?**

This project is perfect for replication by other Federal agencies and programs, and the process should be applied throughout the Federal government. By launching parallel surveys with other federal agencies, agencies will be able to benchmark performance and share best practice information. Further, agencies can begin to rely more heavily on quantitative data in addition to qualitative data to optimize program improvements. While key elements of this project are readily transferable to other agencies, much of the power of this methodology has to do with how it is customized to take into account the individual actions, programs and nuances

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of a specific agency. As such, the project should be customized for each agency to ensure maximum benefits to the NEPA program.

In addition to replicating this project within other federal agencies, this project is also developing best practices on a range of topics relevant to NEPA. These best practices can be replicated by other agencies and applied to other Federal actions and programs. Further, the more that this project is replicated by other federal agencies, the more best practices will be surfaced that can promote peer-to-peer learning and continuous improvement of NEPA implementation within the Federal government.

### **PART III. PROJECT DESCRIPTION**

*(See attachment on following page.)*

## **PART III: PROJECT DESCRIPTION**

### **Introduction**

FEMA helps the United States prepare for, respond to, and recover from hazards such as hurricanes, floods, fires, and acts of terrorism. Many actions taken by FEMA occur during emergencies, under intense pressures, and with short timelines. With disaster preparedness and response and a large grant-making function, FEMA's actions often have significant effects on the human environment.

Given this, it is critical that FEMA's NEPA program function as efficiently and effectively as possible and that it fully supports FEMA's mission.

In 2010, FEMA launched a performance improvement project. This innovative project applies performance management methodologies proven in the private sector and uses those methodologies to systematically assess and improve environmental planning and historic preservation (EHP) performance. This project can be customized for use by other federal agencies and can improve NEPA implementation throughout the federal government.

### **Project Description and Implementation:**

This project is divided into four phases:

1. During Phase 1, FEMA defined the attributes of a "world-class EHP organization" -- "a federal agency that consistently demonstrates competence and effectiveness in using EHP data to make good decisions and consistently complies with all EHP requirements while meeting mission objectives." Through interviews with federal agencies, and reviews of literature and private-sector performance evaluations, FEMA identified 12 causes of sub-optimal performance and determined that there are 35 management attributes that drive world-class EHP organizations. The 35 management attributes are grouped into 8 categories including Strategic Alignment, Process Excellence, Internal Communication, and Decision Integration. Together, these 35 management attributes provide a roadmap for improving NEPA performance in federal agencies.
2. During Phase 2, FEMA created a survey to assess how FEMA employees perceive the importance of each attribute and how they perceive FEMA's effectiveness at accomplishing each attribute. FEMA distributed this survey nationwide to staff who interact with the NEPA/EHP function. From these responses, FEMA prepared a prioritization index and an alignment index to facilitate data analysis. The prioritization index is enabling FEMA to focus its performance efforts on those attributes most in need of improvement. The alignment index is enabling FEMA to identify misalignments between NEPA/EHP staff and program staff over the perceived importance and effectiveness of particular attributes. Organizational misalignment can lead to inefficiencies and conflicts within any organization. By identifying misalignments, FEMA can help its employees attain a common understanding of the importance of attributes supporting the NEPA process.
3. During Phase 3, FEMA developed staffing options for a world-class EHP organization. FEMA reviewed and analyzed the FEMA EHP function and human capital plans of other agencies to develop a baseline model for EHP staffing. Once

the model was developed, FEMA conducted a series of interviews with FEMA staff to develop a snapshot of regional resources and needs. These snapshots included factors and drivers affecting EHP human capital needs and capacity in the future. Phase 3 concludes with a series of findings and staffing recommendations, developed through an analysis of staffing options for regional offices. This Phase builds on the results of Phase 2 and will produce specific recommendations around resource allocation, training, strategic alignment and decision integration.

4. During Phase 4, FEMA will use the data from Phase 2 and 3 to identify strategies and best practices to improve performance on priority attributes. This multi-step process will include interviews and targeted surveys to compare performance and strategies across federal agencies and across FEMA regions and programs.

#### Project Status and Timeline

FEMA has completed Phases 1 and 2 of this project and is nearing completion of Phase 3. FEMA is now launching Phase 4, which will be complete by the end of 2011. Following completion of Phase 4, FEMA will prepare training modules and briefing materials to promote adoption of best practice throughout FEMA.

#### Resources

FEMA has allocated the resources necessary to complete this project.

#### Agreement with Administration's Priorities

This project supports two Administration priorities. First, the project systematically improves the performance of FEMA's NEPA function, thereby enhancing environmental outcomes and contributing to sustainability, a high-priority performance goal. Second, this project promotes the use of performance management methodologies as called for by OMB (see Memorandum for Executive Departments and Agencies from Shelley Metzenbaum, June 25, 2010).

#### Alternate Point of Contact

The FEMA Point of Contact for this project is: Angela R. Gladwell, Director, FEMA Office of Environmental Planning and Historic Preservation.